

SEALED

FILED

MAR 13 2024

BONNIE HACKLER
Clerk, U.S. District Court

By Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID HASKELL MOORE,

Defendant.

SEALED

Case No.

CR 24-043 RAW

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

**DEALING FIREARMS WITHOUT A LICENSE
[18 U.S.C. §§ 922(a)(1)(A), 923(a), & 924(a)(1)(D)]**

Beginning in or about January, 2023, and continuing until on or about September 6, 2023, within the Eastern District of Oklahoma, the defendant, **DAVID HASKELL MOORE**, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT TWO

**FIREARMS TRAFFICKING
[18 U.S.C. § 933(a)(1) & 933(b)]**

Beginning on or about July 11, 2023, and continuing until on or about September 6, 2023, in the Eastern District of Oklahoma, the defendant, **DAVID HASKELL MOORE**, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, including, but not limited to, the following:

- Savage Arms Inc. 62 .22 caliber rifle bearing serial number 4368230;
- Savage Arms inc. 62 .22 caliber rifle bearing serial number 4386025;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-62824;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63585;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63567;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63479;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63482;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63537;
- Marlin Firearms Co. 60 .22 caliber rifle bearing serial number MM03491H;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-41261;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63476;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63487;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63414;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63569;
- Sun City Machinery Co., LTD Stevens 320 20-gauge shotgun bearing serial number 211073T;
- Ruger 10/22 .22 caliber rifle bearing serial number 0024-40422;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63493;
- Ruger 10/22 .22 caliber rifle bearing serial number 0024-39715;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63486;
- Ruger 10/22 .22 caliber rifle bearing serial number 0024-40471;
- Ruger 10/22 .22 caliber rifle bearing serial number 0024-40424;
- Ruger 10/22 .22 caliber rifle bearing serial number 0024-40378;

- Sun City Machinery Co., LTD Stevens 320 20-gauge shotgun bearing serial number 215053T; and
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63578,

to another person in or otherwise affecting interstate and foreign commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, and attempt to do so, in violation of Title 18, United States Code, Section 933(a)(1) and 933(b).

FORFEITURE ALLEGATION
[18 U.S.C. §§ 924(d) and 934(a) & 28 U.S.C. § 2461(c)]

The allegations contained in Count One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 924(d) and 934(a), and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations charged in Counts One and Two of this Indictment involving violations of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), 924(a)(1)(D), 933(a)(1), and 933(b), the defendant, **DAVID HASKELL MOORE**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and 934(a), and Title 28, United States Code, Section 2461(c) any and all of the defendant's right, title and interest in all property constituting and derived from any proceeds obtained directly and indirectly as the result of such offenses, and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses, as well as all firearms and ammunition involved in the commission of the offenses, including, but not limited to:

- Savage Arms Inc. 62 .22 caliber rifle bearing serial number 4368230;
- Savage Arms inc. 62 .22 caliber rifle bearing serial number 4386025;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-62824;

- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63585;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63567;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63479;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63482;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63537;
- Marlin Firearms Co. 60 .22 caliber rifle bearing serial number MM03491H;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-41261;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63476;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63487;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63414;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63569;
- Sun City Machinery Co., LTD Stevens 320 20-gauge shotgun bearing serial number 211073T;
- Ruger 10/22 .22 caliber rifle bearing serial number 0024-40422;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63493;
- Ruger 10/22 .22 caliber rifle bearing serial number 0024-39715;
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63486;
- Ruger 10/22 .22 caliber rifle bearing serial number 0024-40471;
- Ruger 10/22 .22 caliber rifle bearing serial number 0024-40424;
- Ruger 10/22 .22 caliber rifle bearing serial number 0024-40378;
- Sun City Machinery Co., LTD Stevens 320 20-gauge shotgun bearing serial number 215053T; and
- Ruger 10/22 .22 caliber rifle bearing serial number 0023-63578.

A TRUE BILL:

CHRISTOPHER J. WILSON
United States Attorney



RYAN BONDURA, SC Bar # 104079
Assistant United States Attorney

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY